

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:

SIMONA S. ROBINSON

Debtor

Chapter 13

Case No. 22-13307-MDC

**AFFIDAVIT IN SUPPORT OF  
MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY**

I, Diego Rojas, declare under penalty of perjury as follows:

1. I am employed as a Contract Management Coordinator of PHH Mortgage Corporation and am authorized to sign this Affidavit on behalf of PHH Mortgage Corporation as servicer for The Bank of New York Mellon f/k/a The Bank of New York as successor in interest to JPMorgan Chase Bank, National Association, as Trustee for GSRPM Mortgage Pass-Through Certificates, Series 2003-1 (the "Movant"). This Affidavit is provided in support of the Motion for Relief from Stay and Co-Debtor Stay (the "Motion") filed contemporaneously herewith.

2. I make this affirmation based upon my review of the records with regard to this underlying loan transaction, which are kept in the ordinary course of business of PHH Mortgage Corporation. As part of my job responsibilities for PHH Mortgage Corporation, I have personal knowledge of and am familiar with the types of records maintained by PHH Mortgage Corporation in connection with the loan that is the subject of the Motion (the "Loan") and the procedures for creating those types of records. I have access to and have reviewed the books, records and files of PHH Mortgage Corporation that pertain to the Loan and extension of credit given to Debtors concerning the property securing such Loan.

3. The information in this affidavit is taken from PHH Mortgage Corporation's business records regarding the Loan. The records are: (a) made at or near the time of the occurrence of the matters recorded by person with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in

the course of PHH Mortgage Corporation's regularly conducted business activities; and (c) it is the regular practice of PHH Mortgage Corporation to make such records.

4. Douglas M Robinson and Simona Robinson has/have executed and delivered or is/are otherwise obligated with respect to that certain promissory note referenced in the Motion (the "Note").

5. As of December 5, 2023, there are one or more defaults in paying Debtors post-petition amounts due with respect to the Note.

6. As of December 5, 2023, the total unpaid principal balance is \$58,899.86 which includes the unpaid principal balance of \$58,899.86 and deferred principal balance of \$0.00.

7. As of December 5, 2023, the total post-petition arrearage/delinquency is \$2,372.61 consisting of (i) the foregoing total of missed post-petition payment in the amount of \$2,372.61 plus (ii) the foregoing post-petition fees in the amount of \$0.00 attached hereto as **Exhibit "B"**.

8. Attached hereto as **Exhibit "A"** is a post-petition payment history including a statement of the total amount due to cure the post-petition default.

9. As of December 5, 2023, the chapter 13 plan has been confirmed.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 14 day of DECEMBER, 2023.

Diego Rojas  
Signature Diego Rojas

Name Contract Management  
Coordinator

Title  
PHH Mortgage Corporation as servicer for The  
Bank of New York Mellon f/k/a The Bank of New  
York as successor in interest to JPMorgan Chase  
Bank, National Association, as Trustee for GSRPM  
Mortgage Pass-Through Certificates, Series 2003-1

STATE OF FLORIDA  
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization this 14 day of DECEMBER, 2023, by Diego Rojas as Contract Management Coordinator for PHH Mortgage Corporation, who is the servicer for The Bank of New York Mellon f/k/a The Bank of New York as successor in interest to JPMorgan Chase Bank, National Association, as Trustee for GSRPM Mortgage Pass-Through Certificates, Series 2003-1, who is **personally known to me** or who has produced — as identification.

Claribel Lopez  
Signature of Notary Public

Name of Notary Public: Claribel Lopez  
Notary Commission Expiration Date: —  
Personally Known: ✓  
OR Produced Identification: —  
Type of Identification Produced: —

